

Hamid Michael Hejazi  
Inmate ID # 3925882  
Lane County Adult Corrections  
101 West 5<sup>th</sup> Avenue  
Eugene, OR 97401-2695

United States District Court  
District of Oregon

Hamid Michael Hejazi  
Plaintiff,

v.

Mark Esper, US Department  
of the Army, and US Equal  
Employment Opportunity Commission  
Defendants

Case No. 6-19-cv-00149-MK

Motion For Appointment  
of Pro Bono Counsel

I, plaintiff Hamid Michael Hejazi, move for the appointment of Pro Bono Counsel. To support this motion, I declare under penalty of perjury that: I have attached an affidavit demonstrating my inability to pay the cost of an attorney.

I have made the following diligent efforts to obtain legal counsel but have been unsuccessful because of my poverty: I contacted 2 Oregon State Bar recommended lawyers and they refused to assist me as I could not pay them. I need appointed counsel to assist me because: my case deals with a complicated area of law, federal martial regulations; it has far reaching public interest and policy ramifications; I am not knowledgeable in the law; and, I'm in jail and inhibited as such.

Signed,   
Hamid Michael Hejazi

Dated, October 1, 2019

Affidavit In support of  
Motion For Appointment of Pro Bono Counsel

I answer the following under penalty of perjury:

1. I am currently incarcerated, yes, at Lane County Adult Corrections, at 101 West 5th Avenue, Eugene, OR 97401-2695.
2. I am not currently employed, no. My last employer was, name, Rise Services, Inc., in Eugene OR at the Sunshine 420 house, from October 20th, 2017 till November 7, 2017, (See US District Court case 6:18-cv-02102-AA), at \$12.00 per hour.
3. I have no spouse or significant other, I'm single and homeless.
4. In the last 12-months I have only received \$45.00 in cash put onto my jail trust and commissary account, (\$10.00 from my brother who is a student in Helsinki Finland, and \$35.00 from a friend), and no other money from any other source.
5. In terms of cash and savings, I have 0.09¢ in my savings account, no money in checking, and \$4.20 remaining on my jail trust account from #4 above. I have no access to cash.
6. In terms of assets, real estate, stocks, bonds, securities, other financial instruments, automobiles, or other valuable property, I have:
  1. A vehicle, a 1998 Dodge Dakota in poor condition, estimated at \$2500.00 in value.
  2. \$35.00 in a farmer's feed co-op in Pitt Meadows, British Columbia.
  3. \$500.00 in Modo, Vancouver British Columbia's carsharing co-op.

Continued -

7. Do I have any other assets? No.

8. Do I have monthly expenses, including housing, transportation, utility, judgements, loan payments, or other regular expenses?

- Yes. I have a cell phone, but cannot afford it any longer, at
- 1.) \$25.00 per month.
  - 2.) I have car insurance, but cannot afford it any longer, at \$65.00 per month.
  - 3.) I have motel housing fees, but cannot afford these, at \$1400.00 per month.
  - 4.) I have storage in Ottawa, Ontario, but cannot afford it, at \$65.00 per month.
  - 5.) I have credit card debt, but cannot afford it, and have defaulted on 2 cards, at \$300 per month, total \$10,000.00 owed.
  - 6.) I have judgements against me from Lane County Circuit court, at \$17,500.00, all payable, which I cannot afford - multiple cases.

9. I have no dependents.

10. I have debt or financial obligations to:

- 1.) Citi Bank VISA \$7000.00 and US Bank VISA \$3000.00, as #8 above.
- 2.) Saint Paul University, Public Ethics MA Completion, \$3400.00 owed.

Michael  
Signature

October 1, 2019  
Date

Hamid Michael Hejazi  
Printed Name